



Dear Chairman Genachowski:

As you know, America's wireless industry operates and thrives on a strong foundation of interoperability – a common platform that has, since the inception of the industry, fostered wireless growth and innovation and granted consumers access to the latest services and devices. For the past four years, however, that foundation has been absent from the Lower 700 MHz band. This is a sharp departure from over 30 years of spectrum policy that began when spectrum was first deployed for cellular in 1981. We write now to urge you to restore this long-standing interoperability policy to the Lower 700 MHz band, spectrum that is important to jobs, investment, and the deployment of next generation wireless services to the American consumers who need it most.

Many of our companies, and the companies we represent, have acquired – either directly from the FCC or on the secondary market – the right to operate on Lower 700 MHz wireless spectrum that was first auctioned by the FCC in 2008. Regardless of how we acquired this spectrum, lack of interoperability is having a chilling effect on the market, investment, and network deployments. Collectively, we and other competitive wireless operators, invested nearly \$2 billion in private capital in this spectrum block. At the time of the 2008 auction, there was a single band class, Band 12, for all of the paired spectrum in the Lower 700 MHz band, including the A Block. Because of 30 years of precedent, auction participants had every indication and expectation that there would be interoperability within that band. We each anticipated using this spectrum to deploy 4G LTE services throughout the nation's smaller cities and rural areas – deployments that we know are critical to the Administration's broadband access goals.

However, since 2008, device interoperability in the Lower 700 MHz band has been thwarted. As a result, competition in the Lower 700 MHz spectrum band has been greatly harmed, coverage substantially restricted, and deployment considerably delayed. The lack of device interoperability has significantly hampered Lower 700 MHz network build out, device availability, and roaming. Without interoperability, substantial numbers of non-urban American consumers and emergency first responders will not be able to access 4G LTE networks.

Fortunately, Mr. Chairman, at this critical moment, you have the ability to restore interoperability and make a permanent impact on the future of wireless services. However, the time to act is now. By taking this action:

- You will immediately unleash billions of dollars of private investment to build out 4G LTE services across the nation on 12 MHz of the best spectrum ever auctioned – investment that will mean over 100,000 jobs over the next five years.
- You will provide consumers with competitive carrier options and, in many areas where the largest carriers will not soon operate, an option for high-speed wireless broadband.
- You will ensure that maximum revenue is generated from future spectrum auctions by providing the market – especially smaller operators and new entrants – with the certainty that newly purchased spectrum licenses can be immediately utilized for deployment.
- You will decrease the taxpayers' cost of providing our nation's emergency first responders with more widespread and immediate access to 4G LTE technologies.

Mr. Chairman, the clock is ticking. The A Block, alone, represents 12 MHz of spectrum on which next generation wireless services can be deployed precisely to those areas that need it most. Restoring interoperability to the Lower 700 MHz band will connect more American consumers and emergency first responders to the fastest wireless technology the world has ever seen. Our ability to put our significant investment in this spectrum to work will result in jobs, small business initiatives, public safety improvement, and next generation wireless deployment.

After three years of waiting, a final rule must be adopted this year. Any further delay would be too costly for the nation's economic recovery, jobs, broadband deployment to underserved markets, and public safety. The facts are clear that interoperability can be restored without harm and the benefits are overwhelmingly in the public interest. It is imperative to act now to restore interoperability in the Lower 700 MHz band.

Very truly yours,



Hu Meena
President and Chief Executive Officer
C Spire Wireless



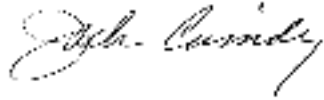
Steven K. Berry
President and Chief Executive Officer
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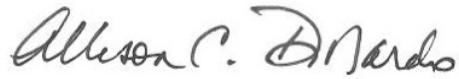
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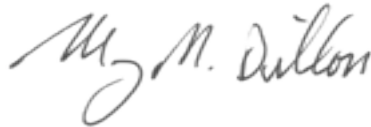
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